

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

VLADISLAV KLYUSHIN  
Defendant

CRIMINAL NO. 21-cr-10104-PBS

**MOTION FOR LEAVE TO FILE SUPPLEMENTAL REQUEST TO EXCLUDE  
GEOLOCATION EVIDENCE**

Now comes the Defendant Vladislav Klyushin, by and through undersigned counsel, and hereby respectfully requests leave to file a supplemental request to exclude geolocation evidence, attached hereto as Exhibit A. Following the filing of the defendant's *Omnibus Motion in Limine*, the government produced additional discovery – invoices from the company that hosted, at certain times, the relevant IP Addresses – which it represented at the prior status conference would potentially obviate the need to introduce MaxMind's analysis. Based on the government's latest opposition it intends to introduce both the invoices and the MaxMind analysis. Accordingly, the defense respectfully requests leave to file a supplemental request to exclude from evidence both the invoices and the MaxMind analysis.

**WHEREFORE**, the defense respectfully requests this Honorable Court to grant its request.

### **COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

The undersigned counsel has conferred with the Government, who by and through AUSA Seth Kosta, indicated that it is likely to agree to the request, but has not yet given its assent.

Respectfully Submitted,  
Vladislav Klyushin,  
By His Attorney,

/s/ Maksim Nemtsev  
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Dated: January 5, 2023

**CERTIFICATE OF SERVICE**

I, Maksim Nemtsev, hereby certify that on this date, January 5, 2023, a copy of the foregoing documents has been served via Electronic Court Filing system on all registered participants.

/s/ Maksim Nemtsev  
Maksim Nemtsev, Esq.